

**UNITED STATES DISTRICT
COURT SOUTHERN DISTRICT OF
TEXAS HOUSTON DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JACK STEPHEN PURSLEY,

Defendant.

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Case 4:18-cr-00575

DEFENDANT'S THIRD AMENDED EXHIBIT LIST

| | | |
|--|---|--|
| PRESIDING JUDGE: Judge Lynn N. Hughes | PLAINTIFF'S ATTORNEYS: Grace Albinson, Sean Beaty, and Jack Morgan | DEFENDANT'S ATTORNEYS: Victor Vital, Alicia Raines Barrs, and Nicole LeBoeuf |
| TRIAL DATE: 09/03/2019 | COURT REPORTER: | COURTROOM DEPUTY: |

| DEF. NO. | DATE OFFERED | MARKED | ADMITTED | DATE OF EXHIBIT | DESCRIPTION OF EXHIBIT | BATES RANGE |
|-------------|-----------------|--------|----------|---------------------------|--|---|
| 1 | | | | 12/19/12 | Email from Mooney to ddial@www.hgd.com | MA_00037537- 00037539 |
| 2 | | | | 05/19/14 | Executive Summary to IRS CI by Counsel for Shaun P. Mooney | Mooney-000695- Mooney-000698 |
| 3 | | | | 09/22/14 | OVDP | IRS-001725 – IRS- 001944 |
| 4 | | | | 08/26/13 | Email from Shaun Mooney from Andrew Mellor | BL-FILE 2-000111 |
| 5 | | | | 11/05/08 | Letter from Shaun Mooney to Nigel Tibey | BL- IOMFTL FILE 2-000206 – BL- IOMFTL FILE 2- 000220 |
| 6 | | | | 05/19/09 | Gillis email to Coughtrey re new matter | Gillis_00022122- Gillis_00022127 |
| 7 | | | | 12/03/14 | Shaun Mooney v. Charles Gillis and Gillis, Paris, Henrich, PLLC | Gillis_0000083- Gillis_0000085 |
| 8 | | | | 01/04/13 | IRGP v. Mooney, Original Petition | Civ-Lit 000139- 000148 |
| 9 | | | | 05/03/13 | IRGP Settlement Agreement and Mutual Release | MA_00037564- 00037591 |
| 10 | | | | | INTENTIONALLY LEFT BLANK | |
| 11 | | | | | INTENTIONALLY LEFT BLANK | |
| 12 | | | | | Shaun Mooney business card | MA_00037543 |
| 13 | | | | | Mooney Affidavit | CIV-LIT-000246 – CIV-LIT-000249 |
| 14 | | | | 04/10/18 | Gillis Letter of Non-Prosecution (executed by Davis) | MA_00037592 – MA_00037594 |
| 15 | | | | 06/30/09 | Email from Mooney to Gillis | IRGP0001367 – IRGP0001368 |
| 16 | | | | 00/00/07 – 00/00/08 | Stock Transfer Sheets | Gillis_0052995 – Gillis_0052998 |
| 17 | | | | | Work assigned/status | |
| 18 | | | | 08/14/13 | Email from Michael Coughtery to Charles Gillis August 14, 2013 | Gillis_00048546 – Gillis_00048548 |

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|----------|--------------|--------|----------|-----------------|---|-----------------------------------|
| 19 | | | | | Pursley Individual Master File | IRS-0005044 – IRS-0005072 |
| 20 | | | | 02/23/17 | 2017 Check from Minns to U.S. Treasury | IRS-002575 |
| 21 | | | | | 2014 IRS refund check | MA_00037561 |
| 22 | | | | | 2015 IRS refund check | MA_00037562 |
| 23 | | | | | 2016 IRS refund check | MA_00037563 |
| 24 | | | | | Picture of Pursley Family | MA_00038603 |
| 25 | | | | | Ron Braver, CV | MA_00038591-38398 |
| 26 | | | | | Stephen Grace, CV | MA_00038540-00038565 |
| 27 | | | | | Fred Gavin CV | MA_00037287-MA_00037293 |
| 28 | | | | 07/21/11 | Form 484 Change to Company Details – APHC | MA_00006678 – MA_00006679 |
| 29 | | | | 09/01/09 | APHC Share Certificate No. 2 | MA_00006623-MA_00006637 |
| 30 | | | | 06/30/10 | APHC Financial Report YE June 30 2010 | Gillis_00029792 - Gillis_00029800 |
| 31 | | | | 01/25/16 | Email from Gillis to Dan Cogdell | Gillis_0003558 - Gillis_0003560 |
| 32 | | | | 03/04/09 | Corporate Meeting Summary | CIV-LIT-000303-CIV-LIT-000307 |
| 33 | | | | 01/19/17 | Letter from Hooper to Reynolds | |
| 34 | | | | 01/20/17 | Letter from Hooper to Minns | |
| 35 | | | | 03/27/13 | Email from Gillis to Glover | B&T_000344 – B&T_000351 |
| 36 | | | | | Lisa Jude Letter | Pursley-001132 |
| 37 | | | | 04/26/10 | Agreement for Sale of Limited Partnership or Assets of Partnership | CIV-LIT-000308 – CIV-LIT-000351 |
| 38 | | | | 06/10/11 | Email from Eduard Venerabile to Gillis June 10, 2011 | Gillis_0002835 |
| 39 | | | | 08/14/09 | Email from Eduard Venerabile to Gillis August 14, 2009 | Gillis_00031869 – Gillis_00031881 |
| 40 | | | | 08/04/11 | Email from Gillis to Gary Glover August 4, 2011 | Gillis_0017290-Gillis_0017291 |
| 41 | | | | 08/30/10 | Email from Gillis to Glover and Coughtrey August 30, 2010 | Gillis_0018786 |
| 42 | | | | 08/24/10 | Email from Gillis to Glover | Gillis_0018790 – Gillis_0018791 |
| 43 | | | | | Mooney Resume | Gillis_0019869 |
| 44 | | | | 08/05/09 | Email from Gillis to 5gloves@ozemail.com.au | Gillis_0020835 |
| 45 | | | | 07/24/09 | Email from Gillis to 5gloves@ozemail.com.au | |
| 46 | | | | 08/14/13 | Email from Gillis to Coughtrey | Gillis_00048538 |
| 47 | | | | 06/21/12 | Email from Pursley to Andrew Mellor | IOMFTL-GPC-0003-000293 |
| 48 | | | | 06/30/09 | Email from Gillis to Mooney and Pursley | IRGP0001372 |
| 49 | | | | 06/27/07 | Email from Mellor to rcsalazar@fnslaw.com.oh | IRGP0002824 |
| 50 | | | | 06/20/07 | Email from Mooney to Nigel Tebay | IRGP0002848 |
| 51 | | | | 06/25/07 | Email from Mooney to Nigel Tebay | IRGP0002850 |
| 52 | | | | 08/02/09 | Email Gillis to 5gloves@ozemail.com.au | Gillis_00031635-Gillis_00031626 |
| 53 | | | | 07/06/07 | Email from Mooney to Pursley | IRGP0003394 |
| 54 | | | | 05/10/11 | Email from Gillis to Pursley and Mooney | Gillis_00029971 – Gillis_00029972 |
| 55 | | | | 05/31/18 | Tom Foster Interview Recording | B&T_000368 |
| 56 | | | | 06/04/13 | Email from Gillis to Venerabile | Gillis_0001497 |

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|----------|--------------|--------|----------|-----------------|--|---|
| 57 | | | | 07/10/13 | Letter from Mooney to Gillis | MA_00038604 |
| 58 | | | | 02/22/12 | Email from Gillis to Venerabile | UHY.SYD-001237 |
| 59 | | | | 12/21/12 | Email from Pursley to Nelson | B&T_000010 |
| 60 | | | | 12/21/12 | Email from Mooney to Pursley | B&T_000011 |
| 61 | | | | 08/14/01 | Letter from Venerabile to The Directors of Dutton Limited | IRGP0004466 – IRGP0004476 |
| 62 | | | | 04/10/13 | Option Contract for the sale of shares in APHC | B&T_000012 – B&T_000014 |
| 63 | | | | 01/24/16 | Email from Gillis to Slogar | B&T_000015 – B&T_000017 |
| 64 | | | | 07/28/09 | Email from Pursley to Gillis | Gillis_00047286 – Gillis_00047292 |
| 65 | | | | 07/30/09 | Gillis Letter to Directors of Southeastern Shipping Company Limited | Gillis_00020803 – Gillis_00020804 |
| 66 | | | | 10/29/09 | Gillis letter to Pursley re opinion re Federal Income Tax Consequences | Gillis_00020279- Gillis_00020290 |
| 67 | | | | 11/26/18 | Declaration of Susan English [ECF 61] | MA_00037294- MA_00037295 |
| 68 | | | | | IRS Refund Check | MA_00037296 |
| 69 | | | | 06/05/09 | RPLP Certificate of Formation | TX-SOS-0000282 – TX-SOS-0000283 |
| 70 | | | | 08/27/09 | APHC Resolution of Directors | GILLIS_00020426 |
| 71 | | | | 09/14/12 | Email from Venerabile to Glover and Gillis | B&T_000018 – B&T_000022 |
| 72 | | | | 08/21/12 | Email from Venerabile to Gillis | Gillis_0049471 – Gillis_0049472 |
| 73 | | | | 04/19/13 | Email from Venerabile to Glover | B&T_000352 B&T_000365 |
| 74 | | | | 07/25/10 | Letter from Gillis to SES Directors | IOMFTL-GPC-0014-000023- IOMFTL-GPC-002-00011 |
| 75 | | | | | SA Caivano handwritten notes | |
| 76 | | | | 02/05/19 | Order [ECF 70] | |
| 77 | | | | | Email from Mooney to Salazar | 007677-007679 |
| 78 | | | | 04/10/12 | Email from Mellor to Gillis | IOMFTL-GPC-0014-000023 IOMFTL-GPC-0014-000025 |
| 79 | | | | 07/30/09 | Letter from Venerabile to Directors of SES | PURSLEY-002561- PURSLEY-00252 |
| 80 | | | | 00/00/05 | Business Development Agreement | MA_00037297- MA_00037300 |
| 81 | | | | 05/06/05 | Email from Sholem to Pursley | MA_00037301- MA_00037305 |
| 82 | | | | 09/09/05 | Email from Shuman to Pursley | MA_00037306 |
| 83 | | | | 03/13/06 | Email from Shuman to Pursley | MA_00037307 |
| 84 | | | | 08/07/07 | Email from Shuman to Pursley | MA_00037308 |
| 85 | | | | 09/05/08 | Email from Pursley to Shuman | MA_00037309- MA_00037310 |
| 86 | | | | 10/23/08 | Email from Pursley to Shuman | MA_00037311 |
| 87 | | | | 11/07/07 | Email from Pursley to Shuman | MA_00037312 |
| 88 | | | | 02/01/12 | Email from Venerabile to Gillis and Mellor | B&T_000023 – B&T_000024 |
| 89 | | | | 04/10/12 | Email from Venerabile to Mellor and Gillis | B&T_000025 – B&T_000027 |
| 90 | | | | 10/24/11 | Email from Pursley to Bratcher | BMA-0000229 |
| 91 | | | | 06/14/13 | Email from Bratcher to Pursley | BMA-0000583 |

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| 92 | | | | 10/21/11 | Email from Richman to Bratcher | BMA-0000585 |
| 93 | | | | 09/30/10 | Email from Bratcher to Pursley | |
| 94 | | | | 08/13/12 | Email from Venerabile to Gillis and Coughtrey | B&T_000028 – B&T_000029 |
| 95 | | | | 11/08/12 | Email from Venerabile to Gillis and Mellor | B&T_000030 – B&T_000032 |
| 96 | | | | 01/17/13 | Stoneworth Financial Letter | B&T_000033 – B&T_000036 |
| 97 | | | | 01/26/13 | Email from Bratcher to Richman | Bratcher-0004991 |
| 98 | | | | 01/24/13 | Email from Bratcher to Richman | Bratcher-0004992 |
| 99 | | | | 06/29/12 | APHC Cover Letter to UHY re Financial Report YE June 30 2011 | B&T_000037 |
| 100 | | | | unknown | APHC Director's Declaration | B&T_000038 |
| 101 | | | | 01/26/13 | Emails from Bratcher to Richman and Salinas | MA_00037325-MA_00037326 |
| 102 | | | | 09/30/10 | Email from Bratcher to Pursley | MA_00037327 |
| 103 | | | | 04/19/13 | Email from Eduard Venerabile to Glover | B&T_000039 – B&T_000046 |
| 104 | | | | 02/23/12 | Email from Bratcher to Pursley and Salinas | MA_00037330 |
| 105 | | | | 10/16/13 | Emails from Bratcher to Richman and Salinas | MA_00037325-MA_00037326 |
| 106 | | | | 05/04/18 | Townsend email to Listserv | B&T_000369 – B&T_000370 |
| 107 | | | | 04/20/12 | Humphries email to Pursley Steve and Tracy | MA_00037335 – MA_00037336 |
| 108 | | | | 04/23/13 | Bratcher email to Pursley | |
| 109 | | | | 11/11/11 | Email from Richman to Pursley | MA_00037338 |
| 110 | | | | 07/19/11 | Email Pursley to Salinas | MA_00037339 |
| 111 | | | | | INTENTIONALLY LEFT BLANK | |
| 112 | | | | 07/12/09 | July 2009 Draft Gillis Memo to Pursley re Opinion on Qualified Dividend | MA_00001856 – MA_00001873 |
| 113 | | | | 12/03/14 | Mooney v Gillis Original Petition | Gillis_0000083 – Gillis_0000085 |
| 114 | | | | 02/27/15 | Plaintiff's Notice of Non-Suit | CIV-LIT-000564-CIV-LIT-000566 |
| 115 | | | | 01/19/15 | Mooney's Response to Defendant's Request for Disclosure | MA_00001564-MA_00001567 |
| 116 | | | | 08/15/12 | APHC Circular Resolutions of Directors | B&T_000047 |
| 117 | | | | | Promissory Note Between Pursley Interest and 4-7s | Bratcher-0001791-Bratcher-0001793 |
| 118 | | | | 07/01/10 | Promissory Note between Arosa & IRGP | Bratcher-0000436 |
| 119 | | | | 01/15/11 | Promissory Note between Recruitment Partners & Four Sevens Investment Corp | Bratcher-0001796-Bratcher-0001798 |
| 120 | | | | 06/07/10 | Promissory Note between Pursley Interest LLC & Four Sevens Investment Corp | 000895-000897 |
| 121 | | | | 01/13/10 | Promissory Note between Recruitment Partners LP and Four Sevens Investment Corp | 000923-000925 |
| 122 | | | | 11/19/09 | Promissory Note between Recruitment Partners, LP and Four Sevens Investment Corp | 000963-000965 |
| 123 | | | | 11/19/09 | Promissory Note Recruitment Partners & Four Sevens | Bratcher-0019314-Bratcher-0019316 |
| 124 | | | | 08/31/11 | Promissory Note Recruitment Partners & Four Sevens Investment | Bratcher-0019309-Bratcher-0019310 |

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|----------|--------------|--------|----------|-----------------|--|-----------------------------|
| 125 | | | | 07/11/16 | Email from Colleen Prince Steve Pursley | MA_00037358- MA_00037360 |
| 126 | | | | | Rental Property Dashboard | MA_00037361- MA_00037362 |
| 127 | | | | | 2014 Vacasa Tax Docs Attached | MA_00037363 |
| 128 | | | | 07/21/17 | Email from Dana Macik to Pursley | MA_00037365 |
| 129 | | | | | Welcome Package | MA_00037366- MA_00037368 |
| 130 | | | | | Four Sevens Profit Scenario | MA_00037369 |
| 131 | | | | 12/21/12 | Email from Pursley to Agee, Betzer and Harris | B&T_000048 |
| 132 | | | | 07/19/12 | Email from Venerabile to Gillis and Glover | B&T_000049 – B&T_000050 |
| 133 | | | | 10/01/09 | Pursley Memorandum to Mooney re Progress Report and Advisement | IRGP0005658 |
| 134 | | | | 07/25/10 | Letter from Gillis to IOMA attaching minutes | B&T_000051 – B&T_000057 |
| 135 | | | | | Jack Townsend Blog | MA_00037370- MA_00037393 |
| 136 | | | | 03/00/14 | Ruling Submission Request submitted by Cantrell & Cantrell | B&T_000058 – B&T_000206 |
| 137 | | | | 09/14/11 | Email from Mooney to Pursley | MA_00037494 |
| 138 | | | | 08/26/11 | Email from Mooney to Pursley | MA_00037493 |
| 139 | | | | 05/26/11 | Email from Clint Brown to Pursley | MA_00037492 |
| 140 | | | | 05/20/11 | Email from David Johnson to Pursley | MA_00037491 |
| 141 | | | | 01/20/09 | Email from Mooney to Pursley | MA_00037490 |
| 142 | | | | 12/01/08 | Email from Pursley to Mooney | MA_00037487- MA_00037489 |
| 143 | | | | 11/14/08 | Email from Mooney to Pursley | MA_00037485- MA_00037486 |
| 144 | | | | 11/05/08 | Email from Pursley to Mooney | MA_00037484 |
| 145 | | | | 09/04/08 | Email from Mooney to Pursley | MA_00037483 |
| 146 | | | | 09/01/08 | Email from Mooney to Pursley | MA_00037482 |
| 147 | | | | 07/07/08 | Email from Pursley to Mooney | MA_00037481 |
| 148 | | | | 06/27/08 | Email from Mooney to Pursley | MA_00037480 |
| 149 | | | | 02/20/08 | Email from Boone to Mooney | MA_00037479 |
| 150 | | | | 02/03/08 | Email from Mooney to Boone | MA_00037478 |
| 151 | | | | 01/24/08 | Email from Mooney to Pursley | MA_00037477 |
| 152 | | | | | Schrader Westchester Real Estate File | B&T_000207 – B&T_000220 |
| 153 | | | | | Jim Miceli real estate file | B&T_000221 – B&T_000254 |
| 154 | | | | 01/02/08 | Email from Mooney to Boone and Pursley | MA_00037474 |
| 155 | | | | 12/18/07 | Email from Mooney to Boone and Pursley | MA_00037472- MA_00037473 |
| 156 | | | | 12/14/07 | Email from Mooney to Pursley | MA_00037470- MA_00037471 |
| 157 | | | | 12/04/07 | Email from Mooney to Boone and Pursley | MA_00037468- MA_00037469 |
| 158 | | | | 11/29/07 | Email from Mooney to Pursley | MA_00037467 |
| 159 | | | | 00/00/03 | Strategic Negotiation Planning for Acquisition | MA_00037394- MA_00037416 |
| 160 | | | | | Agreement Gulf States and The Westchester Group Inc | MA_00037417- MA_00037418 |
| 161 | | | | 04/07/99 | Melnik letter to IOMFL | BL-IOMFTL FILE 1-000336 |
| 162 | | | | 10/25/07 | Email from Kevin Weldon to Mooney | MA_00037466 |

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|----------|--------------|--------|----------|-----------------|--|---------------------------|
| 163 | | | | | The Offshore Money Manual | B&T_000255 – B&T_000257 |
| 164 | | | | 04/14/10 | Addendum to Agreement for Sale of Limited Partnership or Assets | B&T_000258 |
| 165 | | | | 06/30/09 | Amendment and Revision to RPLP Limited Partnership Agreement | B&T_000259 – B&T_000267 |
| 166 | | | | 04/01/07 | Email from Shetter to Mooney | B&T_000268 |
| 167 | | | | 01/20/14 | Cantrell letter to Hooper | B&T_000269 – B&T_000270 |
| 168 | | | | 01/28/10 | Email from Mooney to Pursley | B&T_000271 |
| 169 | | | | 01/28/10 | Email from Mooney to Gillis | B&T_000272 |
| 170 | | | | 04/25/06 | Email from Shetter to Mooney | B&T_000273 |
| 171 | | | | 10/03/05 | Email from Shuman to Pursley | B&T_000274 |
| 172 | | | | 06/30/10 | Southeastern Shipping Company Limited Summarized Profit and Loss Account for the YE 30 June 2010 | MA_00007421 – MA_00007422 |
| 173 | | | | 05/10/11 | Glover Memorandum to Gillis | MA_00007439 – MA_00007441 |
| 174 | | | | | INTENTIONALLY LEFT BLANK | |
| 175 | | | | 02/26/06 | Email from Shetter to Mooney | Disco ID 124511-1 |
| 176 | | | | 10/01/13 | Cantrell letter to Hooper | B&T_000275 |
| 177 | | | | 01/03/14 | Hooper letter to Nelson | B&T_000276 – B&T_000278 |
| 178 | | | | 12/24/18 | Letter from IRS | B&T_000279 – B&T_000281 |
| 179 | | | | 01/21/10 | Email from Gillis to Mooney | B&T_000282 – B&T_000285 |
| 180 | | | | 08/26/10 | Email from Mooney to Parkhill | B&T_000286 – B&T_000287 |
| 181 | | | | 06/02/09 | Email from Markley to Gillis | B&T_000288 |
| 182 | | | | 05/21/09 | Email from Markley to Gillis | B&T_000289 – B&T_000291 |
| 183 | | | | 05/11/09 | Email from Markley to Gillis | B&T_000292 – B&T_000296 |
| 184 | | | | 10/08/09 | Email from Markley to Gillis | B&T_000297 |
| 185 | | | | 09/28/09 | Email from Markley to Gillis | B&T_000298 |
| 186 | | | | 09/24/09 | Email from Markley to Gillis | B&T_000299 – B&T_000305 |
| 187 | | | | 08/20/09 | Email from Markley to Gillis | B&T_000306 |
| 188 | | | | 09/07/10 | Email from Markley to Gillis | B&T_000307 – B&T_000308 |
| 189 | | | | 09/07/10 | Email from Markley to Hodson | B&T_000309 – B&T_000310 |
| 190 | | | | 01/25/10 | Email from Mooney to Gillis | B&T_000311 – B&T_000312 |
| 191 | | | | 01/28/10 | Email from Mooney to Gillis | B&T_000313 – B&T_000314 |
| 192 | | | | 02/10/10 | Email from Mooney to Gillis | B&T_000315 |
| 193 | | | | 03/04/10 | Email from Mooney to Gillis | B&T_000316 |
| 194 | | | | 03/04/10 | Email from Mooney to Gillis | B&T_000317 |
| 195 | | | | 03/05/10 | Email from Mooney to Gillis | B&T_000318 – B&T_000320 |
| 196 | | | | 06/16/10 | Email from Mooney to Gillis | B&T_000321 – B&T_000322 |
| 197 | | | | 06/28/10 | Email from Mooney to Gillis | B&T_000323 – B&T_000324 |
| 198 | | | | 06/28/10 | Email from Mooney to Gillis | B&T_000325 |
| 199 | | | | 08/21/10 | Email from Mooney to Gillis | B&T_000326 – B&T_000327 |

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| 200 | | | | 07/16/10 | Email from Mooney to Gillis | B&T_000328 |
| 201 | | | | 07/19/10 | Email from Mooney to Gillis | B&T_000329 – B&T_000330 |
| 202 | | | | 07/28/10 | Email from Mooney to Gillis | B&T_000331 – B&T_000332 |
| 203 | | | | 03/16/11 | Email from Mooney to Gillis | B&T_000333 |
| 204 | | | | 07/14/09 | Email from Mooney to Gillis | B&T_000334 – B&T_000335 |
| 205 | | | | 07/16/09 | Email from Mooney to Gillis | B&T_000336 |
| 206 | | | | 09/30/08 | Email from Pursley to Mooney | B&T_000337 |
| 207 | | | | | INTENTIONALLY LEFT BLANK | |
| 208 | | | | 06/30/09 | Email from Pursley to Agee, Betzer and Harris | B&T_000338 |
| 209 | | | | 10/21/11 | Email from Richman to Bratcher | MA_00037607-MA_00037609 |
| 210 | | | | 12/19/12 | Email from Richman to Mooney | B&T_000339 – B&T_000341 |
| 211 | | | | 10/25/11 | Email from Richman to Pursley | B&T_000342 |
| 212 | | | | 02/24/16 | England letter to Pursleys | England-01413 |
| 213 | | | | | Statement Regarding Related Party Advances | England-01544 |
| 214 | | | | 01/25/13 | Email from Bratcher to Richman | MA_00037341 – MA_00037342 |
| 215 | | | | 01/10/13 | Email from Richman to Salinas | MA_00037343 – MA_00037345 |
| 216 | | | | 07/10/09 | Gillis Memorandum | IRGP0006113 - 6141 |
| 217 | | | | | Handwritten Notes | B&T_000343 |
| 218 | | | | 03/02/11 | Email from Pursley to Salinas | MA_00037350 – MA_00037351 |
| 219 | | | | 02/01/10 | Email from Pursley to Bratcher | MA_00037353 |
| 220 | | | | 05/30/12 | Richman Memorandum to Pursley | MA_00037357 |
| 221 | | | | 08/27/15 | Check to Infinisource | B&T_000366 |
| 222 | | | | 11/04/15 | Check to Infinisource | B&T_000367 |
| 223 | | | | | As Amended Form 5471 | IRS-0006835 – IRS-0006846 |
| 224 | | | | 05/09/11 | Pursley email to Shuman | B&T_000371 - B&T_000372 |
| 225 | | | | | Sandy Creek Ranch – Valuation Summary | B&T_000373 |
| 226 | | | | 08/24/14 | Mooney v Pursley (Harris County, 2014-44623) Plaintiff's Original Petition and Request for Disclosure | B&T_000374 - B&T_000406 |
| 227 | | | | 12/28/18 | Pursley v Mooney v RPLP and IRC (Harris County; 2017-282294) Plaintiff's Sixth Amended Original Petition | B&T_000407 - B&T_000453 |
| 228 | | | | 07/29/11 | Salinas email to Pursley attaching general ledgers | B&T_000454 - B&T_000489 |
| 229 | | | | 10/04/11 | Salinas email to Pursley attaching Bookkeeping | B&T_000490 |
| 230 | | | | 03/20/10 | Salinas email to Pursley | B&T_000762 |
| 231 | | | | 03/22/10 | Salinas email to Pursley | B&T_000763 |
| 232 | | | | 03/11/11 | Salinas email to Pursley | B&T_000765 |
| 233 | | | | 03/02/15 | Pursley email to England | B&T_000766 |
| 234 | | | | 05/12/15 | Pacheco email to Pursley | B&T_000767 |
| 235 | | | | 07/09/15 | Christmann email to Pursley | B&T_000768 |
| 236 | | | | 10/01/15 | Pursley email to Christmann | B&T_000769 |
| 237 | | | | 02/11/13 | Nguyen email to Pursley | B&T_000771 |
| 238 | | | | 09/01/12 | Vinarco, IRC, RPLP and Westoceanic Contribution and Purchase Agreement | B&T_000790 |

| DEF. NO. | DATE OFFERED | MARKED | ADMITTED | DATE OF EXHIBIT | DESCRIPTION OF EXHIBIT | BATES RANGE |
|----------|--------------|--------|----------|-----------------|---|--|
| 239 | | | | 12/31/12 | Mooney Fraud Risk Inquiries Form | B&T_000863 |
| 240 | | | | 12/31/10 | Mooney Fraud Risk Inquiries Form | B&T_000866 |
| 241 | | | | | Handwritten notes | B&T_000869 |
| 242 | | | | 11/04/09 | Gillis email to Pursley and Mooney | Gillis_00031417 |
| 243 | | | | 02/27/15 | Mooney v Gillis (Harris County; 2014-70310) Order | |
| 244 | | | | 02/05/15 | Pacheco email to Pursley | B&T_000886 - B&T_000894 |
| 245 | | | | 04/21/14 | APHC DeRegistration | AUS-SEC-COMM- 000055 |
| 246 | | | | 12/31/10 | RPLP Audited Financial Statements | Bratcher-0011318 |
| 247 | | | | 12/31/11 | RPLP Audited Financial Statements | Bratcher-0018187 |
| 248 | | | | 12/31/12 | RPLP Audited Financial Statements | Bratcher-0021576 |
| 249 | | | | 12/31/12 | Mooney Fraud Risk Inquiries Form | Bratcher-0021550 |
| 250 | | | | 12/01/11 | Stoneworth Financial, LLC letter to Pursley | Bratcher-0021635 |
| 251 | | | | | American Real Estate Properties and Pursley Interests Agreement for Participating Interest | Bratcher-0005056 SC-5 |
| 252 | | | | 08/17/10 | Pursley email to Bratcher | SC-9 |
| 253 | | | | 09/03/09 | APHC Meeting Minutes | CG-8 UHY.SYD-000429 |
| 254 | | | | 05/10/09 | Foster Memorandum to Pursley | FOSTER-000019 Gov. Ex. 001-035 |
| 255 | | | | 07/30/09 | Venerable letter to Coughtrey | Gillis_00031613 Gov. Ex. 001-045 |
| 256 | | | | 02/02/12 | Mellor email to Pursley | IOMFTL-GPC-003- 000124 Gov. Ex. 003-005 |
| 257 | | | | 10/31/12 | Pursley email to Mellor | IOMFTL-GPC-004- 000180 Gov. Ex. 003-020 |
| 258 | | | | 08/06/12 | Venerable email to Mellor | BL-FILE 2-000027 Gov. Ex. 005-037 |
| 259 | | | | 04/17/09 | Foster email to Pursley | IRGP0000024 Gov. Ex. 008-001 |
| 260 | | | | 02/03/10 | Pursley email to Bratcher | MA_00037355 - MA_00037356 |
| 261 | | | | 04/29/09 | Foster fax to Pursley | IRGP0000095 - IRGP0000101 |
| 262 | | | | 04/24/09 | Foster Invoices | Foster-000111 - Foster-000116 |
| 263 | | | | 04/24/09 | Foster Memorandum to Pursley | IRGP0000052 - IRGP0000053 Gov. Ex. 008-013 |
| 264 | | | | 05/07/09 | Foster Memorandum to Pursley | MA_00032751 Gov. Ex. 008-016 |
| 265 | | | | 05/07/09 | Gillis email to Pursley | MOONEY-000126 - MOONEY-000127 Gov. Ex. 009-105 |
| 266 | | | | 09/00/01 | Account Opening Documents for SES Account | RBS/ESC5-001444-1 Gov. Ex. 013-001 |
| 267 | | | | 00/00/07 | 2007 Form 1040X Amended Individual Tax Return - S. Mooney | IRS-0006668 - IRS-0006720 Gov. Ex. 017-069 |
| 268 | | | | 08/29/07 | SES Fax to IOMA / Mellor | IRGP0003117 - IRGP0003118 |
| 269 | | | | 09/20/01 | SES Share Certificates | IRGP0004588 - IRGP0004592 |
| 270 | | | | 04/25/09 | Pursley email to Mooney | IRGP0005946 - IRGP0005948 |
| 271 | | | | 09/00/01 | SES Corporate Records | IRGP0006713 - IRGP0006812 |

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|----------|--------------|--------|----------|-----------------|---|----------------------------|
| 272 | | | | 08/25/10 | Webb email to Pursley | MA_00038483 |
| 273 | | | | 12/01/10 | Mercer email to Pursley | MA_00038512 |
| 274 | | | | 09/11/13 | Buschholtz email to Pursley | MA_00038504 |
| 275 | | | | | IRC Marketing Document | B&T_000870 |
| 276 | | | | | Steve Mooney Travel History Excel | |
| 277 | | | | | Steve Mooney TECS 5pp. | |
| 278 | | | | | Steve Mooney Travel History 2pp. | |
| 279 | | | | | Steve Mooney Travel Documents List | |
| 280 | | | | | David Melnick Travel History Excel | |
| 281 | | | | | David Melnick TECS i94 Result List 2pp. | |
| 282 | | | | | David Melnick TECS 34pp. | |
| 283 | | | | | Shaun Mooney TECS Report 10pp. | Gov. Ex. 163 |
| 284 | | | | | Steve Pursley TECS Report 9pp. | Gov. Ex. 164 |
| 285 | | | | 08/23/14 | Venerable email to Pursley | B&T_000871 |
| 286 | | | | 03/03/10 | Shetter email to Mooney, et al. | B&T_000872 – B&T_000877 |
| 287 | | | | 03/10/10 | Shetter email to Mooney, et al. | B&T_000878 |
| 288 | | | | 03/06/11 | Mooney email to Shetter, Steve Mooney, et al. | B&T_000879 - B&T_000880 |
| 289 | | | | 02/05/08 | Stephen Mooney email to Shaun Mooney | B&T_000881 |
| 290 | | | | 08/17/10 | Pursley email to Bratcher | B&T_000882 - B&T_000885 |
| 291 | | | | 05/28/09 | Ratification and Indemnification of Corporate Actions of SES for the Formation and Ownership of Pehlambbridge Limited | Pursley-000230 |
| 292 | | | | 06/21/11 | Venerable email to Mellor | BL-FILE 2-000017 |
| 293 | | | | 08/04/09 | Gillis Memorandum to Coughtrey | IRGP0001802 |
| 294 | | | | 00/00/02 | IRS Interest Calculator_2002 FSI | B&T_000895 |
| 295 | | | | 00/00/03 | IRS Interest Calculator_2003 FSI | B&T_000897 |
| 296 | | | | 00/00/04 | IRS Interest Calculator_2004 FSI | B&T_000899 |
| 297 | | | | 00/00/05 | IRS Interest Calculator_2005 FSI | B&T_000901 |
| 298 | | | | 00/00/06 | IRS Interest Calculator_2006 FSI | B&T_000903 |
| 299 | | | | 00/00/07 | IRS Interest Calculator_2007 FSI | B&T_000905 |
| 300 | | | | 00/00/07 | IRS Interest Calculator_2007 Rep Div | B&T_000907 |
| 301 | | | | 00/00/08 | IRS Interest Calculator_2008 FSI | B&T_000909 |
| 302 | | | | 00/00/08 | IRS Interest Calculator_2008 Rep Div | B&T_000911 |
| 303 | | | | 00/00/09 | IRS Interest Calculator_2009 FSI | B&T_000913 |
| 304 | | | | 00/00/09 | IRS Interest Calculator_2009 Rep Div | B&T_000915 |
| 305 | | | | 00/00/10 | IRS Interest Calculator_2010 FSI | B&T_000917 |
| 306 | | | | 00/00/10 | IRS Interest Calculator_2010 NPT Div | B&T_000919 |
| 307 | | | | 00/00/10 | IRS Interest Calculator_2010 Rep Div | B&T_000921 |
| 308 | | | | 00/00/11 | IRS Interest Calculator_2011 FSI | B&T_000923 |
| 309 | | | | 00/00/11 | IRS Interest Calculator_2011 Rep Div | B&T_000925 |
| 310 | | | | | Interest and Penalty Calcs.xlsx | B&T_000927 |
| 311 | | | | | Historical currency converter with official exchange rates from | B&T_000928 |
| 312 | | | | | IRS-002024 penalty computation | B&T_000929 |
| 313 | | | | 06/30/10 | Australian Ptrs 6-30-2010 | B&T_000932 |
| 314 | | | | | Penalty Computation | B&T_000941 |
| 315 | | | | | Penalty Computation.xlsx | B&T_000942 |
| 316 | | | | 00/00/02 | 2002 As filed | B&T_000943 |
| 317 | | | | 00/00/03 | 2003 As filed | B&T_000957 |
| 318 | | | | 00/00/04 | 2004 As filed | B&T_000966 |
| 319 | | | | 00/00/05 | 2005 As filed | B&T_000980 |
| 320 | | | | 00/00/06 | 2006 As filed | B&T_000991 |

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|----------|--------------|--------|----------|-----------------|---|-------------|
| 321 | | | | 00/00/07 | 2007 As filed | B&T_001015 |
| 322 | | | | 00/00/08 | 2008 As filed | B&T_001045 |
| 323 | | | | 00/00/09 | 2009 As filed | B&T_001066 |
| 324 | | | | 00/00/10 | 2010 As filed | B&T_001090 |
| 325 | | | | 00/00/11 | 2011 As filed | B&T_001132 |
| 326 | | | | 00/00/02 | 2002 Repatriated Dividend Income with Form 5471 | B&T_001182 |
| 327 | | | | 00/00/03 | 2003 Repatriated Dividend Income with Form 5471 | B&T_001212 |
| 328 | | | | 00/00/04 | 2004 Repatriated Dividend Income with Form 5471 | B&T_001237 |
| 329 | | | | 00/00/05 | 2005 Repatriated Dividend Income with Form 5471 | B&T_001267 |
| 330 | | | | 00/00/06 | 2006 Repatriated Dividend Income with Form 5471 | B&T_001294 |
| 331 | | | | 00/00/07 | 2007 Form 1040X Repatriated Dividend Income | B&T_001325 |
| 332 | | | | 00/00/07 | 2007 Repatriated Dividend Income with Form 5471 | B&T_001354 |
| 333 | | | | 00/00/08 | 2008 Form 1040X Repatriated Dividend Income | B&T_001389 |
| 334 | | | | 00/00/08 | 2008 Repatriated Dividend Income with Form 5471 | B&T_001409 |
| 335 | | | | 00/00/09 | 2009 Form 1040X Repatriated Dividend Income | B&T_001440 |
| 336 | | | | 00/00/09 | 2009 Repatriated Dividend Income with Form 5471 | B&T_001467 |
| 337 | | | | 00/00/10 | 2010 Form 1040X Repatriated Dividend Income | B&T_001498 |
| 338 | | | | 00/00/10 | 2010 Repatriated Dividend Income with Form 5471 | B&T_001542 |
| 339 | | | | 00/00/11 | 2011 Form 1040X Repatriated Dividend Income | B&T_001592 |
| 340 | | | | 00/00/11 | 2011 Repatriated Dividend Income with Form 5471 | B&T_001642 |
| 341 | | | | 00/00/02 | 2002 1040X FSI Other Income | B&T_001698 |
| 342 | | | | 00/00/02 | 2002 FSI Income (02-11) | B&T_001712 |
| 343 | | | | 00/00/03 | 2003 1040X FSI Other Income | B&T_001745 |
| 344 | | | | 00/00/03 | 2003 FSI Income (02-11) | B&T_001754 |
| 345 | | | | 00/00/04 | 2004 1040X FSI Other Income | B&T_001782 |
| 346 | | | | 00/00/04 | 2004 FSI Income (02-11) | B&T_001797 |
| 347 | | | | 00/00/05 | 2005 1040X FSI Other Income | B&T_001831 |
| 348 | | | | 00/00/05 | 2005 FSI Income (02-11) | B&T_001843 |
| 349 | | | | 00/00/06 | 2006 1040X FSI Other Income | B&T_001874 |
| 350 | | | | 00/00/06 | 2006 FSI Income (02-11) | B&T_001899 |
| 351 | | | | 00/00/07 | 2007 1040X FSI Other Income | B&T_001932 |
| 352 | | | | 00/00/07 | 2007 FSI Income (02-11) | B&T_001961 |
| 353 | | | | 00/00/08 | 2008 1040X FSI Other Income | B&T_001998 |
| 354 | | | | 00/00/08 | 2008 FSI Income (02-11) | B&T_002018 |
| 355 | | | | 00/00/09 | 2009 1040X FSI Other Income | B&T_002051 |
| 356 | | | | 00/00/09 | 2009 FSI Income (02-11) | B&T_002078 |
| 357 | | | | 00/00/10 | 2010 1040X FSI Other Income | B&T_002110 |
| 358 | | | | 00/00/10 | 2010 FSI Income (02-11) | B&T_002154 |
| 359 | | | | 00/00/11 | 2011 1040X FSI Other Income | B&T_002204 |
| 360 | | | | 00/00/11 | 2011 FSI Income (02-11) | B&T_002256 |
| 361 | | | | 00/00/04 | 2004 1040X FSI Inc & NPT Div (04-11) | B&T_002314 |
| 362 | | | | 00/00/04 | 2004 FSI Inc & NPT Div (04-11) | B&T_002329 |
| 363 | | | | 00/00/05 | 2005 1040X FSI Inc & NPT Div (04-11) | B&T_002363 |
| 364 | | | | 00/00/05 | 2005 FSI Inc & NPT Div (04-11) | B&T_002375 |
| 365 | | | | 00/00/06 | 2006 1040X FSI Inc & NPT Div (04-11) | B&T_002406 |
| 366 | | | | 00/00/06 | 2006 FSI Inc & NPT Div (04-11) | B&T_002431 |
| 367 | | | | 00/00/07 | 2007 1040X FSI Inc & NPT Div (04-11) | B&T_002464 |

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| 368 | | | | 00/00/07 | 2007 FSI Inc & NPT Div (04-11) | B&T 002493 |
| 369 | | | | 00/00/08 | 2008 1040X FSI Inc & NPT Div (04-11) | B&T 002530 |
| 370 | | | | 00/00/08 | 2008 FSI Inc & NPT Div (04-11) | B&T 002551 |
| 371 | | | | 00/00/09 | 2009 1040X FSI Inc & NPT Div (04-11) | B&T 002584 |
| 372 | | | | 00/00/09 | 2009 FSI Inc & NPT Div (04-11) | B&T 002617 |
| 373 | | | | 00/00/10 | 2010 1040X FSI Inc & NPT Div (04-11) | B&T 002649 |
| 374 | | | | 00/00/10 | 2010 FSI Inc & NPT Div (04-11) | B&T 002693 |
| 375 | | | | 00/00/11 | 2011 1040X FSI Inc & NPT Div (04-11) | B&T 002743 |
| 376 | | | | 00/00/11 | 2011 FSI Inc & NPT Div (04-11) | B&T 002795 |
| 377 | | | | | Additional tax liability foreign source income | B&T 002854 |
| 378 | | | | | Computation of Additional Tax Due and Owing SM - OVDP 2012 - FSI | B&T_002855 |
| 379 | | | | | Computation of Additional Tax Due and Owing SM - OVDP 2012 - Repatriated Income | B&T_002856 |
| 380 | | | | | OVDP Penalty Computation | B&T 002857 |
| 381 | | | | | Tax Interest and Penalty Paid by Shaun Mooney with OVDP | B&T_002858 |
| 382 | | | | | Schedule J computation worksheet | B&T 002859 |
| 383 | | | | | Summary of Tax Liabilities on Foreign Income Tabbed Versions - 8-19-13 Int date.xlsx | B&T_002860 |

Defendant reserves the right to amend its exhibit list as needed prior to and during trial.

Respectfully submitted,

/s/ Victor D. Vital

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CERTIFICATE OF SERVICE

I certify that on August 21, 2019, a copy of this document was served on all counsel. I further certify that on August 22, 2019, a copy of this document was filed with the court and all counsel of record through filing on the ECF System.

/s/ Victor D. Vital

Victor D. Vital